

**Boston Edison Company**

**JOINT MOTION TO  
EXTEND THE SUSPENSION PERIOD  
FOR THE PROPOSED RATE WR, M.D.T.E. NO. 974**

16/350414.2

Department's past decisions concerning Rate WR, the requirements of the relevant provisions of Chapter 164 of the General Laws, and the public interest. Pending the final resolution of this matter, the Standstill Agreement between MWRA and Edison would continue to apply to the same extent as during the initial suspension period.

In support of their motion, the Moving Parties submit the following as good cause for an additional extension of the suspension period:

- ?? The program for a Rate WR Transition Cost Charge extends beyond the upcoming year and the resulting necessity to ensure that the agreed upon language will produce the intended results under various scenarios has required an extensive review by the parties of proposed language;
- ?? An additional one month extension of the suspension period will result in a five month suspension of the proposed changes to Rate WR, which remains within the maximum suspension period set forth in G.L. c. 164, § 94.
- ?? The terms of the Standstill Agreement between MWRA and Edison preclude any party or the public interest from being harmed or benefited as a result of an additional delay in the effectiveness of any change in Rate WR.

The Moving Parties expect that a final written agreement will be submitted to the Department for its approval no later than the close of business on Thursday, April 30. In these circumstances, the Moving Parties submit that the public interest would be served by a limited extension of the suspension period in this proceeding.

Respectfully submitted,

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Authority

By its attorneys,

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